

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 4/1/2022

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

March 31, 2022

VIA ECF and EMAIL

Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007
c/o: ChambersNYSDRamos@nysd.uscourts.gov

**Re: United States v. Erik Ciriaco
21 Cr. 450 (ER)**

Dear Judge Ramos:

I write to respectfully request that the Court temporarily modify Mr. Ciriaco's bail conditions so that he travel with fiancé to Honey Brook, Pennsylvania, on April 2nd, 2022. Mr. Ciriaco's fiancé is picking up her new support animal in Honey Brook, and Mr. Ciriaco is hoping to drive her there. They will leave the morning of April 2nd, 2022 and return that same day. Mr. Ciriaco will communicate all of his travel plans with his pre-trial officer (PTSO) Ashley Cosme. Pre-Trial Services (PTS) have no objection to this modification. The Government defers to PTS.

On May 13, 2021, Magistrate Judge Sarah Netburn imposed, inter alia the following bail conditions upon Mr. Trippitelli: a \$75,000 personal recognizance bond cosigned by two FRPs; travel limitations to SDNY and EDNY; surrendering of all travel documents (with no new applications); Pretrial Supervision as directed by PTS; Home detention and location monitoring; Mr. Ciriaco's fiancé was to serve as a third-party custodian; and that Mr. Ciriaco was to complete a detox program at the direction of PTS. On December 15th, 2021, Your Honor granted a bail modification taking Mr. Ciriaco off home detention and placing him on curfew enforced by location monitoring.

Mr. Ciriaco has been doing exceptionally well on pre-trial release. He completed an in-patient detox program, and now regularly attends outpatient programming at Samaritan Daytop Village. He is enrolled in college and holds steady employment. Thank you for your consideration.

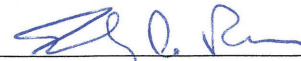
Respectfully Submitted,

Zawadi Baharanyi, Esq.
Assistant Federal Defender
Tel: 212-417-8735

cc: AUSA Kaylan Lasky

MEMO ENDORSED

The application is X granted
_____ denied



Edgardo Ramos, U.S.D.J

Dated: 4/1/2022

New York, New York